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SUMMONS

Attorney(s) Bramnick, Rodriguez, Grabas,
 Office Address Arnold & Mangan, LLC
1827 East Second Street
 Town, State, Zip Code Scotch Plains, New Jersey 07076
 Telephone Number (908) 322-7000
 Attorney(s) for Plaintiff Brent Bramnick, Esq.
Cadenna Peavy,

**Superior Court of
New Jersey**

Union _____ COUNTY
 Law _____ DIVISION

Docket No: UNN-L-3223-19Plaintiff(s)

Vs.

ART Enterprises NJ, LLC, John Does 1-10 (fictitious) &XYZ Corporations 1-10 (fictitious),Defendant(s)**CIVIL ACTION
SUMMONS**

From The State of New Jersey To The Defendant(s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

Clerk of the Superior CourtDATED: 09/16/2019Name of Defendant to Be Served: ART Enterprises NJ, LLC (Reg Agt: Incorp Services Inc.)Address of Defendant to Be Served: 208 West State Street, Trenton, NJ 08608

Brent Bramnick, Esq. (027412008)
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GRABAS, ARNOLD & MANGAN,
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Attorney for Plaintiff

CADENNA PEAVY,

Plaintiff,

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: UNION COUNTY
DOCKET NO.:

v.

Civil Action

ART ENTERPRISES NJ, LLC, JOHN
DOES 1-10 (said names being fictitious),
and XYZ CORPORATIONS 1-10 (said
names being fictitious),

COMPLAINT, JURY DEMAND,
DEMAND FOR PRODUCTION OF
DOCUMENTS AND DEMAND

Defendant.

Plaintiff, CADENNA PEAVY, residing at 11 Barnert Place, City of Paterson,
County of Passaic and State of New Jersey, by way of Complaint against defendants,
ART ENTERPRISES NJ, LLC, JOHN DOES 1-10 and XYZ CORPORATIONS 1-10
says:

FIRST COUNT

1. On or about March 4, 2019, plaintiff, CADENNA PEAVY, was legally
and lawfully on the premises owned, operated, maintained, repaired, controlled and/or
supervised by defendant, ART ENTERPRISES NJ, LLC, which premises are located
at 11 Barnert Place, City of Paterson, County of Passaic and State of New Jersey.

2. Defendant, ART ENTERPRISES NJ, LLC did fail to properly own,
operate, maintain, control, repair and/or supervise the subject premises.

3. As a direct and proximate result of the negligence of the defendants as aforesaid, plaintiff was caused to fall and suffer injuries, has suffered and will in the future suffer much pain in mind and body, has incurred and will in the future incur expenses for medical care and treatment, has suffered and will in the future suffer economic loss, was unable and will in the future be unable to attend to her usual and customary activities and was caused to suffer permanent injury.

WHEREFORE, plaintiff, CADENNA PEAVY, demands judgment against the defendant, ART ENTERPRISES NJ, LLC, for damages together with interest, counsel fees and costs of suit.

SECOND COUNT

1. Plaintiff repeats and reiterates the allegations contained in the First Count of the Complaint as if set forth more fully at length herein.

2. At all times relevant hereto there may have been unidentified persons or entities responsible for the ownership, operation, supervision, control, maintenance and/or repair of defendant's property. These parties have been designated in the caption of the Complaint as JOHN DOES 1-10 and XYZ CORPORATIONS 1-10.

3. Plaintiff reserves the right to amend the Complaint to join these potentially culpable parties if discovery should reveal that said parties are in any way responsible for the injuries sustained by plaintiff.

WHEREFORE, plaintiff, CADENNA PEAVY, demands judgment against the defendant, ART ENTERPRISES NJ, LLC, JOHN DOES 1-10 (names unknown) and/or XYZ CORP. 1-10 (names unknown) for damages together with interest, counsel fees and costs of suit.

DESIGNATION OF TRIAL ATTORNEY

In accordance with R.4:25-4, BRENT A. BRAMNICK, ESQ., is named as the Designated Trial Attorney for this matter.

JURY DEMAND

Plaintiffs hereby demand a trial by jury as to all issues in this matter.

DEMAND FOR INSURANCE INFORMATION

Plaintiff hereby demands that defendants set forth the name of any insurance carrier providing coverage for plaintiff's injuries, the policy number and the extent of liability limits, and provide a copy of the corresponding declarations page.

DEMAND FOR PRODUCTION OF DOCUMENTS

PLEASE TAKE NOTICE that pursuant to Rule 4:18-1, plaintiff hereby demands that the defendants produce the following documentation within thirty-five (35) days as prescribed by the Rule of Court. Additionally, please be advised that the following requests are ongoing and continuing in nature and the defendants are therefore required to continuously update their responses thereto as new information or documentation comes into evidence.

1. The amounts of any and all insurance coverage covering the defendants including but not limited to primary insurance policies, secondary insurance policies and/or umbrella insurance policies. For each policy of insurance, supply a copy of the declaration page therefrom.
2. Copies of any and all documentation or reports, including but not

limited to police reports, accident reports and/or incident reports concerning the happening of the incident in question or any subsequent investigation of same.

3. Color copies or duplications of any and all photographs, motion pictures, videotapes, films, drawings, diagrams, sketches or other reproductions, descriptions or accounts concerning the individuals involved in the incident in question, the property damage sustained, the accident scene, or anything else relevant to the incident in question.

4. Copies of any and all signed or unsigned statements, documents, communications, and/or transmissions, whether in writing, made orally or otherwise recorded by any mechanical or electronic means, made by any party to this action, any witness, or any other individual, business, corporation, investigative authority or other entity concerning anything relevant to the incident in question. This includes statements and/or communications provided to defendant's insurance company and/or any adjuster acting on behalf of that insurance company, and/or to any other party. This request is made pursuant to Pfender v. Torres, 336 N.J. Super, 379 (App. Div. 2001).

5. Copies of any and all documentation, including but not limited to any contracts between the owner of the property or product involved in the incident in question and any of the parties involved in this matter. This specifically includes, but is not limited, to, the Deed for the subject property, and/or any and all Leases for the subject property.

6. Copies of all documents, including but not limited to, safety manuals, publications regarding industry standards, statutes, rules, regulations, which relate to

and/or support any and all defenses asserted by defendant.

7. Copies of any and all discovery received from any other parties to the action in question.

8. Copies of any and all reports regarding the plaintiff received by the defendants, or any other party to this suit, from either the Central Index Bureau (C.I.B.) or from any other source.

9. Copies of any and all medical information and/or documentation received by defendant concerning the plaintiff in this matter, whether it concerns any medical condition or treatment which took place before, during or after the time of the incident in question.

10. Copies of all documents received by defendant pursuant to any subpoenaed and/or any other source, concerning the plaintiff and/or the incident in question.

11. Any and all video recordings made of plaintiff and/or the subject matter of this accident.

12. If the responding defendant is a commercial, corporate, and/or otherwise a business entity, provide copies of any and all formation and/or incorporation documents, as well as copies of any and all franchise agreement documents.

13. The entire file maintained by experts whom defendant intends to call at trial, including but not limited to, any notes, photographs, videos, draft reports, billing statements, Xray films, and/or other studies.

14. The name, publisher, date of publication, and page reference of each

test, article standard, manual, policy, procedure, directive book, or writing of any kind, which defendant's expert(s) relied upon in any way by defendant's expert witness(es) in formulating an opinion in this matter.

15. A copy of defendant's cell phone records from the date of the accident, the defendant's cell phone number, and the identity of defendant's cell phone service provider on the date of this accident.

16. Please be advised that the plaintiff hereby objects to the taking of any photographs, X-rays or other reproductions concerning the plaintiff or the plaintiff's injuries at the time of any defense examination.

DEMAND FOR ANSWERS TO INTERROGATORIES

Plaintiff hereby demands that defendants answer Form C and C2

Interrogatories within the time prescribed by the Court Rules.

Dated: September 13, 2019

BRAMNICK, RODRIGUEZ, GRABAS,
ARNOLD & MANGAN, LLC
Attorneys for Plaintiff


BRENT BRAMNICK, ESQ.

CERTIFICATION

Pursuant to R. 4:5-1, I hereby certify that the matter in controversy is not the subject of any other pending or contemplated action or arbitration proceeding. Plaintiff is not aware of any other parties who should be joined in this action at this time.

I further certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

Dated: September 13, 2019

BRAMNICK, RODRIGUEZ, GRABAS,
ARNOLD & MANGAN, LLC
Attorneys for Plaintiff



BRENT BRAMNICK, ESQ.